

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

FILED
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2004 JUL 12 P 2:12

CRIMINAL #04-1809-CBS
DISTRICT OF MASS.

UNITED STATES

v.

JOSEPH ALLEN

**DEFENDANT'S MOTION FOR TAPE OF PROBABLE CAUSE/DETENTION
HEARING AND AUTHORIZATION TO OBTAIN TRANSCRIPT**

Joseph Allen, defendant in the above-captioned criminal case, hereby moves this Court pursuant to 18 USC § 3006A (e)(1), to order that he be provided a copy of the tape of the evidentiary hearing held on July 2, 2004. The defendant further requests authorization to obtain a transcript of said tape at public expense. As grounds therefore, defendant avers as follows:

1. The defendant has been adjudicated as indigent by the Court.
2. The tape and transcript of the probable cause/detention hearing held on July 2, 2004 are necessary to the defendant's ability to prepare for trial.

Respectfully submitted,

JOSEPH ALLEN

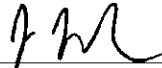
By his attorney,



James L. Sultan, BBO #488400
Rankin & Sultan
One Commercial Wharf North
Boston, MA 02110
(617) 720-0011

CERTIFICATE OF SERVICE

I certify that I have served the foregoing document by mailing a copy, U.S. mail, postage prepaid, to AUSA Michael Pelgro at the US Attorney's Office, 1 Courthouse Way, Boston, MA 02210 this July 7, 2004.



James L. Sultan